

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**LIMETREE BAY SERVICES, LLC, *et al.*,<sup>1</sup>  
  
Debtors.**

**CHAPTER 11**

**CASE NO.: 21-32351**

**(Joint Administration Requested)**

**NOTICE OF AGENDA FOR FIRST DAY HEARING  
ON FIRST DAY MOTIONS SCHEDULED FOR JULY 13, 2021 AT 3:00 P.M.  
(PREVAILING CENTRAL TIME), BEFORE JUDGE DAVID R. JONES AT THE  
UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS, AT COURTROOM 400, 515 RUSK STREET, HOUSTON, TEXAS 77002**

**1. Evidentiary Support for First Day Pleadings**

- a. ***Shapiro First Day Declaration.*** Declaration of Mark Shapiro, Chief Restructuring Officer of Limetree Bay Services, LLC, in Support of Chapter 11 Petitions and First Day Motions (Doc. No. 8).

**Status:** The Declaration will be relied upon as evidentiary support for all first day matters listed below.

**2. Debtors' Emergency Motion Pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1 for Order Directing Joint Administration of Chapter 11 Cases (Doc. No. 4)**

**Status:** This matter is going forward.

**3. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Post-Petition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (IV) Approving Adequate Protection to Pre-Petition Secured Creditors; (V) Modifying the Automatic Stay; and (VI) Scheduling a Final Hearing (Doc. No. 14)**

**Status:** This matter is going forward. The Debtors plan to seek approval of this motion on an interim basis.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Limetree Bay Services, LLC (1866); Limetree Bay Refining Holdings, LLC.(1776); Limetree Bay Refining Holdings II, LLC (1815); Limetree Bay Refining, LLC (8671); Limetree Bay Refining Operating, LLC (9067); Limetree Bay Refining Marketing, LLC (9222). The Debtors' mailing address is Limetree Bay Services, LLC, 11100 Brittmoore Park Drive, Houston, TX 77041.

4. Debtors' Emergency Motion for Authority to (I) Pay Prepetition Wages, Benefits, and Employee Business Expenses; and (II) Continue the Postpetition Maintenance of Employee Benefit Programs, Policies, and Procedures in the Ordinary Course (Doc. No. 13)

**Status:** This matter is going forward.

5. Debtors' Emergency Motion for Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (IV) Granting Related Relief (Doc. No. 10)

**Status:** This matter is going forward.

6. Debtors' Emergency Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a), 345(b), 363, and 364 Authorizing: (I) The Continue Use of the Debtors' Prepetition Cash Management System, Including Existing Bank Accounts, Business Forms, and Company Credit Cards; (II) Continued Use of Intercompany Arrangements and Historical Practices; and (III) Opening New Debtor in Possession Accounts, if Necessary (Doc. No. 12)

**Status:** This matter is going forward. The Debtors plan to seek approval of this motion on an interim basis.

7. Debtors' Emergency Application for Order Appointing BMC Group, Inc. as Claims, Noticing, Solicitation, and Administrative Agent (Doc. No. 9)

**Status:** This matter is going forward.

Respectfully submitted this 13th day of July 2021.

**BAKER & HOSTETLER LLP**

/s/ Elizabeth A. Green

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*(Motion for admission pro hac vice to be  
filed)*

*Proposed Counsel for the Debtors and  
Debtors in Possession*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on July 13, 2021, a true copy of the forgoing was filed with the Court using the CM/ECF System, which will provide notice of such filing to all parties requesting such notice.

/s/ Elizabeth A. Green

Elizabeth A. Green